

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOHN WALDORF,

Plaintiff,  
-against-

LIBERTY MAINTENANCE, INC. and  
MANUEL FRANGOS, individually and as an owner  
and President of Liberty Maintenance, Inc.,

Defendants.

No. 05 CV 2557 (RJH)

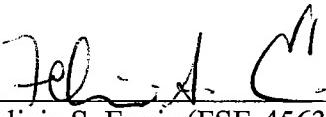
**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT  
PURSUANT TO FED. R. CIV.  
P. 56**

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**PLEASE TAKE NOTICE** that, upon the Affidavit of Felicia S. Ennis, sworn to on August 1, 2006, and the exhibits annexed thereto, and the Memorandum of Law in Support of Defendants' Motion for Summary Judgment dated August 1, 2006, and Defendants' Statement of Undisputed Facts dated August 1, 2006, Liberty Maintenance, Inc. and Manuel Frangos, sued herein individually and as owner and President of Liberty ("Defendants"), will move this Court before the Honorable Richard J. Holwell, District Court Judge, at the United States Courthouse, 500 Centre Street, New York, New York 10007, Courtroom 17B, for an order pursuant to Fed. R. Civ. P. 56, determining that Defendants are entitled to summary judgment, and granting such other relief as the Court deems just and proper.

Dated: New York, New York  
August 1, 2006

ROBINSON BROG LEINWAND GREENE  
GENOVESE & GLUCK P.C.

By: 

Felicia S. Ennis (FSE-4563)  
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